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## **VIA ECF**

The Honorable Tonianne J. Bongiovanni United States District Court District of New Jersey

Re: CC Ford Group West, LLC v. Jennifer Johnson, Project Velocity, Inc., et al. 3:22-cv-04143

Dear Judge Bongiovanni:

Along with Slarskey LLC, we represent Defendants Jennifer Johnson and Project Velocity, Inc. ("Defendants") in the above-referenced case (the "Action"). We write to inform the Court regarding the status of the briefing schedule for Plaintiff's pending Motion for Leave to File Second Amended Complaint (the "Motion").

On July 26, 2024, Plaintiff filed the Motion. The Court initially extended the return date for the Motion to September 3, 2024, with Defendants' opposition due on August 20, 2024 and Plaintiff's reply due on August 27, 2024.

Defendants, having reviewed the proposed amended complaint ("PSAC"), will no longer be opposing the Motion, subject to a reservation of all rights for arguments for a motion to dismiss. Defendants further request that the deadline for any answer to the PSAC be extended until the same date as any answer due from Meredith Manning, Matthew Ornelas-Kuh and PharmaEssentia USA Corporation, once they are served with the PSAC by Plaintiff.

We confirm that Plaintiff consents to the above-described request. Defendants Carrie Bicking and Beth Weiler also consent. The parties will submit a proposed stipulation to the Court once all parties are served with the PSAC.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Amy Luria
Amy Luria, Esq.